

Message

From: d'Almeida, Carolyn K. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9EC4401AFA1846DD93D52A0DDA973581-CDALMEID]
Sent: 6/21/2016 8:58:52 PM
To: Herrera, Angeles [Herrera.Angeles@epa.gov]
CC: Butler, Thomas [Butler.Thomas@epa.gov]; Henning, Loren [Henning.Loren@epa.gov]
Subject: RE: June BCT Site 012 regulatory call
Attachments: ST12. EBR.RAWP.add.2.2nd comment letter.pdf; Williams AFB draft final addendum 2 memo 6 8 16 -Davis (002).pdf; GWTSC-038 Davis Williams AFB EBR Workplan review final (002).pdf

Angeles

The response we sent Friday on the EBR workplan is probably twice buried in your email box but here it is again. Sorry for the inundation! I am working on a talking points memo for you to assist in elevation of issues.

In our response above we assert that the remaining LNAPL at the site has not been quantified. That is not to say that we don't have an estimate of what may still be left behind, as we were discussing in emails with ADEQ today. Both Eva Davis of the Ada Lab and Karla Brasamele of Techlaw independently spoke to Gorm Heron of Terratherm and he told them both there could still be as much as **1 million gallons** give or take of LNAPL remaining at the site. This is **more** mass than they actually removed with the SEE system, and it appears from their current actions Amec intends to spread it and pump thousands of pounds of sodium sulfate (with arsenic concentration 100Xs the MCL along with it to spread/degrade the plume over time. This is a significant change from the original intent of the 2012 RODA where EBR was intended to be a "polishing step".

Forwarded from ADEQ:

FYI - From Praxis --

Current AMEC estimates for remaining saturated zone NAPL = 255,000 gallons to 1,143,000 gallons AFTER SEE.

TOTAL Mass extraction/destruction estimate = **1,131,600 gallons** (excludes SVE Jan-Jun 2016)

The most recent estimates for LNAPL in the SATURATED zone were provided by Amec in the EBR work plan of March 2016, Table 2-1. Conservative Range of 973,000 to 1,546,000 gallons and Base Range of 658,000 to 1,024,000 gallons. Again, these are for the saturated zone ONLY and should be compared to the SEE total of 403,000 gallons.

From: Herrera, Angeles
Sent: Tuesday, June 21, 2016 1:36 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>
Cc: Butler, Thomas <Butler.Thomas@epa.gov>; Henning, Loren <Henning.Loren@epa.gov>
Subject: Re: June BCT Site 012 regulatory call

Thanks Carolyn!

FYI: I called Philip Mook to let him know that I will participate on the call. He appreciated the heads up and said "I was planning to, but now I must." He mentioned he was aware that we have some concerns. He also mentioned that they have received our comments from last Friday.

Carolyn can you please forward those to Tom and I so we can review them before the call. Thxs

I also mentioned that we have a draft response to their letter re St12 but may not be able to send it this wk as we are coordinating with ADEQ.

Thxs.

Angeles

Sent from my iPhone

On Jun 21, 2016, at 10:52 AM, d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov> wrote:

Agenda for the call tomorrow

From: Smallbeck, Donald R. [<mailto:donald.smallbeck@amecfw.com>]
Sent: Monday, June 20, 2016 9:35 AM
To: JERRARD, CATHERINE V CIV USAF HAF AFCEC/CIBW <catherine.jerrard@us.af.mil>; (Geoffrey.Watkin@cn-bus.com) <Geoffrey.Watkin@cn-bus.com>; d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Davis, Eva <Davis.Eva@epa.gov>; Wayne Miller <Miller.Wayne@azdeq.gov>; Pearson, Stuart C. <stuart.pearson@amecfw.com>
Cc: Dan Pope <DPope@css-dynamac.com>; steve@uxopro.com; Barrow, Debbie J <debbie.barrow@amecfw.com>; Corgan, Brian <bcorgan@kilpatricktownsend.com>; Brasaemle, Karla <KBrasaemle@TechLawInc.com>; Rohrbaugh, Amanda <ARohrbaugh@TechLawInc.com>
Subject: June BCT Site 012 regulatory call

BCT members

The BCT regulatory call for Site 12 is scheduled for Wednesday June 22, 2016 at 1:00 PM PST. The meeting will be conducted via teleconference number 866-324-4184 with participation code 8951385#.

Attached are the meeting agenda and 2016 BCT meeting schedule. The ST012 update, deliverable tracking and action item list will be distributed in follow on emails.

D.R. Smallbeck
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<Agenda_June 2016 ST012 BCT.pdf>

<2016 BCT Meeting Schedule-Jun BCT 2016.pdf>